

# MICHIGAN STATE MEDICAL SOCIETY

120 WEST SAGINAW STREET, EAST LANSING, MICHIGAN 48823. PHONE 517/337-1351  
FAX 517/337-2490

OFFICE OF THE PRESIDENT 2013-2014 Kenneth Elmassian, DO

August 6, 2013

Ann Hoffman, President  
MI Academy of Nutrition and Dietetics  
22811 Greater Mack  
Suite 105  
St. Clair Shores, MI 48080

Dear Ms. Hoffman:

On behalf of the more than 15,000 physicians of the Michigan State Medical Society (MSMS), I am writing to convey our opposition to House Bill 4688. As you are aware, House Bill 4688 seeks to repeal the licensure standards for dietitians in Michigan. The licensure provisions for dietitians recognize the importance of training and education with respect to a profession that has a direct interaction with a patient.

Dietitians play an integral role in delivering important services to patients within the health care team. Physicians rely on the expertise of dietitians to implement nutritional plans for patients to ensure their specific needs are met. When a physician refers a patient to a dietitian, it is reassuring to know that the standards for training and education have been met. Eliminating the requirement for dietitian licensure will create confusion within the delivery of health care by reverting to inconsistent levels of training and education and potentially substandard care for patients.

It should be noted that MSMS frequently opposes new classes of licensure. Licensed professions should be limited to those that can demonstrate a sufficient distinction between their education and training compared to those not meeting the minimal standards. Furthermore, licensure should be reserved to those individuals that provide care or services directly to patients. Dietitians meet both of these criteria.

The optimal delivery of health care services occurs within the physician-led team based approach. However, this team requires individuals who have the appropriate level of education and rigorous training. While some changes to the licensing standards for dietitians may be warranted, House Bill 4688 eliminates recognized standards for training and education. House Bill 4688 would create confusion among physicians who wish to refer patients to a qualified dietitian and place patients at risk by allowing less qualified individuals counsel patients.

Sincerely,



Kenneth Elmassian, DO  
President

# American Academy of Pediatrics

DEDICATED TO THE HEALTH OF ALL CHILDREN™



## Michigan Chapter

### MIAAP

106 W. Allegan  
Suite 510  
Lansing MI 48933  
517/484-3013  
Fax: 517/575-6285

### President

Jeannette Gaggino, MD  
Bronson Rambling Rd. Pediatrics  
5629 Stadium Dr.  
Kalamazoo, MI 49009  
269/372-0696  
[GAGGINOL@bronsonhg.org](mailto:GAGGINOL@bronsonhg.org)

### Executive Director

Denise Sloan  
106 W. Allegan  
Suite 510  
Lansing MI 48933  
517/484-3013  
Fax: 517/575-6285  
[dsloan9@gmail.com](mailto:dsloan9@gmail.com)

October 9, 2013

Ms. Ann Hoffman

President, Michigan Academy of Nutrition and Dietetics  
22811 Greater Mack Suite 105  
St. Clair Shores, Michigan 48080

Dear Ms. Hoffman,

On behalf of the 1,300 pediatricians of the Michigan Chapter American Academy of Pediatrics (MIAAP), I am writing to express our opposition to House Bill 4688. As you are aware, House Bill 4688 seeks to repeal the licensure standards for dietitians and nutritionists in Michigan.

Dietitians play an important part in delivering significant services to patients within the health care team. Pediatricians depend on the expertise of the dietitians to implement nutrition plans for patients to make certain that their exact needs are met. It is reassuring for a pediatrician who refers a patient to a dietitian to know that their standards for training and education have been accomplished. Eliminating the requirement for dietitian licensure will generate confusion within the delivery of health care by regressing to inconsistent levels of training and education and potentially an insufficient level of care for our patients.

Pediatricians in Michigan would like to make sure we can choose quality providers with the appropriate level of training and education for our patients. We rely heavily on the integrity and consistency of professional licensure standards as we make these decisions. In Michigan, professional licensure of health care providers is essential to ensuring the health and safety of the public. Dietetics licensure is no exception. It is critical that qualified practitioners, including dietitians, provide safe care and licensure is the necessary component to ensure that the citizens of our state are protected.

Sincerely,

A handwritten signature in cursive script that reads "Denise Sloan".

Denise Sloan  
Executive Director



October 3, 2013

Ann Hoffman, Academy President  
Michigan Academy of Nutrition and Dietetics  
22811 Greater Mack Suite 105  
St. Clair Shores, Michigan 48080

Dear Ms. Hoffman:

On behalf of the Michigan Osteopathic Association (MOA) representing more than 8,000 osteopathic physicians and students in Michigan, we oppose HB 4688 which would repeal the licensure of dietitians and nutritionists based on concerns for the safety of Michigan citizens if this were to pass.

State regulation of the occupation protects the public from potential, but real risk, of harm that can be permanently damaging to a patient's health, ultimately resulting in increased health care costs. Without the protection that licensure provides, unqualified individuals are free to make nutrition claims that are not scientifically based and, in many instances, have delayed or prevented consumers from seeking safe, science-based practices to improve health.

It is our position that as part of the health care team, Registered Dietitians/Nutritionists are qualified, competent and well trained to treat chronic illness in Michigan. Michigan licensure requirements for dietitian/nutritionist professionals establish minimum educational and experience criteria that prepares these health care professionals to care for "our" patients. Additionally, it identifies for the public the most qualified, educated and well-trained professional to work in a coordinated care environment with medical and health care colleagues. For these reasons, the MOA opposes HB 4688.

Sincerely,

Kris T. Nicholoff  
CEO and Executive Director

MICHIGAN OSTEOPATHIC ASSOCIATION

2445 WOODLAKE CIRCLE

OKEMOS, MI 48864

TOLL FREE 800.657.1556



# Michigan Association of Health Plans

September 24, 2013

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*HealthPlus of Michigan*

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*Physicians Health Plan*

**EXECUTIVE DIRECTOR**

Richard B. Murdock  
*Michigan Association of  
Health Plans*

Ms. Ann Hoffman

President, Michigan Academy of Nutrition and Dietetics  
22811 Greater Mack Suite 105  
St. Clair Shores, Michigan 48080

Dear Ms. Hoffman:

On behalf of the Michigan Association of Health Plans I am writing to express my opposition to House Bill 4688 which would repeal the licensure standards for dietitians and nutritionists in Michigan.

The State of Michigan is charged with protecting the health and safety of citizens of our state. Licensure of dietitians and nutritionists provides consumers with reasonable assurance that the licensed individual is competent to provide safe and effective nutrition services. It establishes a minimum standard of education, training and competency in order to practice. In other words, it ensures the expert or right person for the job. MAHP depends on these standards for professionals in the health care area and because of the growing enrollment of individuals with chronic disease we value the services that you are in position to provide.

We appreciate very well that a dietitian or nutritionist is qualified and competent and well trained to treat chronic illness, disease and provide health care in Michigan and should possess a baccalaureate or higher degree with course work approved by the Academy of Nutrition and Dietetics Commission on Accreditation for Dietetics Education and satisfactorily complete a program of 1200 supervised clinical experience approved by the Commission on Dietetic Accreditation of the American Dietetic Association. This is in addition to the requirements on continuing education.

As an organization representing health plans in Michigan, one of our most important tasks is assuring that our health plans can choose quality providers. Therefore we rely heavily on the integrity and reliability of professional licensure standards as we make these decisions. In addition to licensure, our organization is guided by federal law and regulations. In Michigan professional licensure of health care providers is essential to ensuring the health and safety of the public. Dietetics licensure is no exception. It is critical that qualified practitioners, including dietitians, provide safe care and licensure is the necessary component to ensuring that the citizens of our state are protected.

Sincerely,

Richard Murdock  
Executive Director



Wednesday, October 9, 2013

Ms. Ann Hoffman, *President*  
The Michigan Academy of Nutrition and Dietetics  
22811 Greater Mack Avenue, Number 105  
St. Clair Shores, MI 48080

Dear Ms. Hoffman:

The Michigan Primary Care Consortium represents providers, payers, centers of academics who train physicians and clinicians, business and industry (such as Ford Motor, United Auto Workers and Chrysler), numerous health care associations, health care systems, and departments of public health.

We would like to express our opposition to House Bill 4688, which would reverse licensure of registered dietitians and nutritionists.

The Consortium strongly supports the Patient Centered Medical Homes (PCMH) team delivery approach. The PCMH model is able to effectively help patients manage chronic diseases such as diabetes, kidney disease, and hypertension.

Registered dietitians and nutritionists are an integral part of the PCMH delivery approach. The PCMH model is able to maximize its effectiveness and credibility by having all professional team members being licensed. Removing the requirement to license registered dietitians and nutritionists would weaken, not strengthen the PCMH model.

In addition, as many new patients are able to join PCMH practices through the Medicaid expansion program, it is critical that registered dietitians and nutritionists be knowledgeable and up-to-date in all nutritional aspects of care. Maintaining the licensing requirement allows all patients to know that they are receiving safe and quality care.

Thanking you for your prompt attention to ensure that this reversal does not occur.

Respectfully,

Craig Magnatta, D.O.  
Board Chair

Devorah Rich, Ph.D.  
Public Policy Committee Chair

Jeffrey D. Brasie, M.A.  
Executive Director

CC: Consortium Executive Committee, Julie Novak, Kris Nichloff, Debra McGuire, Kathy DeGrow

201 Townsend, Sixth Floor, Lansing, MI 48913  
Phone: 517-241-7353 • Fax: 517-335-9032  
[www.mipcc.org](http://www.mipcc.org)

# MICHIGAN STATE UNIVERSITY

October 11, 2013

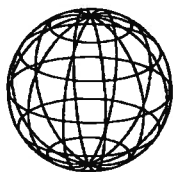
Representative Hugh Crawford, Chair  
House Regulatory Reform Committee  
E: [Hughcrawford@house.mi.gov](mailto:Hughcrawford@house.mi.gov)  
P: 517-373-0827

RE: **HB 4688** to repeal the Dietitian Nutritionist Licensure Law PA 333

Dear Representative Crawford:

As a dietetics educator at our premier land-grant—Michigan State University—I strongly **urge you to oppose HB 4688**. There are three important reasons to stop this bill as listed below and discussed in this testimony.

- 1) Licensure enhances the health and wellbeing of Michigan citizens.
- 2) Dietitians followed the legislative processes to get PA333 passed in 2006.
- 3) Repealing the law is unfair to the hundreds of Michigan dietetic students' investment of thousands of dollars and hours to become competent health professionals in nutrition.



DEPARTMENT OF  
**FOOD SCIENCE AND  
HUMAN NUTRITION**

Michigan State University  
G. Malcom Trout  
Food Science  
and Human Nutrition Building  
East Lansing, MI  
48824-1224

517/355-8474  
FAX: 517/353-8963

[www.msu.edu/unit/fshn](http://www.msu.edu/unit/fshn)

**1) Licensure enhances the health and wellbeing of Michigan citizens.** Licensure was passed in 2006 to protect the health of people in Michigan from people making recommendations that are not evidence-based. Repealing this law for economic reasons makes about as much sense as repealing licensure for nurses, doctors and dentists—so that *anyone* can work in these health professions. HB4688 is backed by those wishing to avoid the education, supervised practice training, registration exam and 500 hours of continuing education credits every five years to maintain registration in dietetics. Licensure identifies for consumers those who are most qualified, educated and trained as nutrition professionals to work in a coordinated health care with medical and health colleagues.

**2) Dietitians followed the legislative processes** to get PA333 passed in 2006 that authorized a State Board of Dietetics and Nutrition to provide the framework for licensing those qualified in nutrition and dietetics. Unfortunately, this process was prolonged by people backed by the food supplement industry. When these pressures to include those without the necessary education, supervised practice or examination equivalents failed, some people attempted to circumvent the process with this new bill.

3) **Repealing the law is unfair** to the thousands of dietetic students in Michigan who have invested thousands of dollars, time and effort to become competent health professionals in nutrition. As a professor in Human Nutrition and educator of dietetic students for the last 29 years, I can speak most strongly to this point. I am pleased to say that MSU has one of the largest and most highly rated dietetics programs in the country. I know firsthand the rigor of the educational and practice requirements in dietetics that is required by our external review board from the Academy. After four years of coursework to understand how food, drugs and supplements affect the metabolism and health of the human body, our students then compete for 9-month internships. Dietitians in health care supervise this required practice in the areas of clinical and public health nutrition and food, so that interns gain experience without causing harm. Every internship program requires a minimum of six weeks in each of these three areas, but most focus the remainder of the internship time in clinical nutrition. Students gain both knowledge and experience with dietary supplements and interactions with food and medications both in their coursework, especially the two in medical nutrition therapy at MSU, as well as in their internships.

It is for these three reasons that I urge this committee to **oppose HB 4688 and maintain PA333**. If HB4668 passes, it means that anyone in Michigan regardless of education, training or exam could practice dietetics and nutrition care services. What a sad day that would be to see "big money" outweigh the health of Michigan citizens.

Sincerely,



Sharon Hoerr, RD, PhD, FACN, Professor  
Department of Food Science and Human Nutrition  
Michigan State University  
469 Wilson Rd, Rm 204 GM Trout Bldg  
East Lansing, MI 48824  
Phone: 517-355-8474 x110  
Email: hoerrs@msu.edu